

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:
THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO,

as representative of

THE COMMONWEALTH OF PUERTO
RICO, et al.,

Debtor

PROMESA Title III

No. 17 BK 3283-LTS
(Jointly Administered)

IN RE:
THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO,

as representative of

PUERTO RICO ELECTRIC POWER
AUTHORITY

Debtor.

PROMESA Title III

No. 17 BK 4780-LTS

**NOTICE OF APPEARANCE, REQUEST FOR NOTICE AND MOTION IDENTIFYING
EXPERT WITNESS FOR 9019 MOTION HEARING**

TO THE HONORABLE COURT:

COMES NOW, Comité Diálogo Ambiental, Inc., El Puente de Williamsburg, Inc.-
Enlace de Acción Climática, Comité Yabucoño Pro-Calidad de Vida, Inc., Alianza Comunitaria
Ambientalista del Sureste, Inc., Sierra Club Puerto Rico, Inc., Mayagüezanos por la Salud y el
Ambiente, Inc., Coalición de Organizaciones Anti Incineración, Inc., Amigos del Río Guaynabo,
Inc., parties-in-interest in the captioned case, and hereby enter their appearance through their
undersigned counsel, and respectfully states and prays as follows:

1. The undersigned counsel have been retained to represent the appearing parties in the above captioned case.
2. Comité Diálogo Ambiental, Inc. (CDA) is a community environmental group composed of residents of the Municipality of Salinas and the Guayama Region and organized as a nonprofit corporation under the laws of the Commonwealth of Puerto Rico since 1997. The purposes of the organization are to promote the general welfare of the communities it serves through education and capacity building of residents concerning the adverse impacts of human activities on the ecologic balance of natural systems and the importance of restoring the environment and promoting conditions under which human beings and the environment can exist in harmony to fulfill economic, social and other needs of present and future generations.
3. El Puente de Williamsburg, Inc.-Enlace Latino de Acción Climática (ELAC) is a nonprofit group and its members are Puerto Rico residents concerned about the impacts of climate change on the Island. ELAC's objectives are to promote multisector discussion on the predictable effects of climate change in Puerto Rico; disseminate studies and information on climate change scenarios; generate discussion of mitigation and adaptation alternatives and their viability for Puerto Rico, and determine optimal parameters for planning for climate change, sea level rise, food security, water availability and the impacts of power generation on climate change.
4. Comité Yabucoeño Pro-Calidad de Vida, Inc. (YUCAE) is non-profit community-based group constituted since 1988, whose mission is for Yabucoa residents to enjoy a sustainable development where economic development, social equity and the conservation of ecosystems are integrated. Their view is to achieve an effective commitment of diverse civic groups,

religious and educational institutions, whose active participation promotes the empowerment of the community, the search for solutions to the main environmental, economic and social problems that our communities face.

5. Alianza Comunitaria Ambientalista del Sureste, Inc. (ACASE) is a non-profit environmental organization constituted since the end of 2015 as a result of the deposit of ashes in the Humacao landfill. Their strategy has been the education visiting the communities of Humacao and neighboring towns orienting on the health problem that implies the burning of the coal and its ashes. We have also offered talks and conferences on renewable energy, the seed harvesting and the public debt of Puerto Rico. Its members are residents of Humacao, Yabucoa, Las Piedras, Caguas, and Patillas, Puerto Rico.
6. Sierra Club Puerto Rico, Inc. (Sierra Club PR) is the local chapter of the biggest, oldest, and most influential environmental organization in the United States. Founded in 1892, the Sierra Club has more than three million members and followers, all inspired by the marvels of nature. Sierra Club's mission is to explore, enjoy, and protect natural treasures. Sierra Club, Puerto Rico chapter was founded in 2005. Since its beginning, the chapter has collaborated with different communities and community-based organizations to protect natural areas, promote public policies that protect the public health and environment, mobilize communities to resist pollution projects such as a proposed natural gas pipeline, garbage incinerators, among other victories. After Hurricane Maria, the chapter has been helping develop sustainable and self-sufficient projects in communities around the island.
7. Mayagüezanos por la Salud y el Ambiente, Inc. (MSA) is a non-profit, community and environmental organization established in 1989 that with volunteers carries out educational, organizational, research and participatory services aimed at the defense and protection of

natural resources, mainly in the western area of Puerto Rico. Their work focuses on the Caño Boquilla Natural Reserve of which the organization is Co-manager and on issues of renewable energy, quality and protection of coastal waters and the rivers that nourish them, among others.

8. Coalición de Organizaciones Anti Incineración, Inc. (COAI) is a coalition of more than 35 organizations and citizens affected by the solid waste incinerator proposed by the company Energy Answer-Arecibo, LLC ("EA") in Arecibo and/or any incineration project in Puerto Rico. We oppose the generation of energy with incineration and/or biomass.
9. Amigos del Río Guaynabo, Inc. (ARG) is an environmental and community organization for the defense of the natural resources of Puerto Rico, especially the water resource.
10. The contact information of the requesting parties, is as follows:

CDA, Víctor Alvarado: Urb. Las Mercedes Calle 13 #71 Salinas, PR 00751 (787) 543-9981 valvarados@gmail.com	ELAC, David Ortiz: 800 Ave. RH Todd, Suite 318 (Piso 3) Comercial 18, Pda. 18 Santurce, PR 00907 (787) 545-5118 dortiz@elpuente.us	YUCAE, Lydia Díaz: HC04 Box 6901 Yabucoa, P.R. 00767-9511 (787) 385-5422 ausubopr88@gmail.com
ACASE, Timmy Boyle: Apartado 10140 Humacao, P.R. 00972 (787) 514-2917 acasepr@gmail.com	Sierra Club PR, José Menéndez: 1016 Avenida Ponce de León Río Piedras, P.R. 00925 (939) 414-3600 jmenen6666@gmail.com	MSA, Julia Mignucci: P.O. Box 3422 Mayaguez, P.R. 00681- 3422 (787) 243-1474 julia.mignuccisanchez@gmail.com
COAI and ARG, Myrna Conty: Valle Escondido #9 Guaynabo, P.R. 00971-8000 (787) 360-6358 gmchg24@gmail.com		

11. The undersigned are environmental and community organizations and active stakeholders on energy issues in Puerto Rico. Their members are concerned citizens and customers

promoting the development of renewable energy in Puerto Rico. Many if not all the members of the organizations are clients of PREPA that will be negatively impacted by the proposed RSA. Its members are Puerto Rico residents subject to the Puerto Rico Electrical Power Authority (PREPA) billing for electric power service, as well as the effects of the Definite Restructuring Support Agreement (RSA). Its members are interested in improving affordability and reliability through rooftop solar and community solar projects.

Hence, the undersigned request from this Honorable Court, pursuant to Rules 2002 and 9010(b) of the Federal Rules of Bankruptcy Procedure, and the *Ninth Amended Notice, Case Management and Administrative Procedures* (In Re: Commonwealth of Puerto Rico (17-03283-LTS) Docket No. 1512-1, applicable by Order in the 17-4780-LTS case Docket No. 11), to accept this notice as a formal appearance in the captioned case and that he be notified with copy of all filings in the case.

WHEREFORE, it is respectfully requested from this Honorable Court to take notice of the above for all relevant purposes.

I HEREBY CERTIFY that, on this same date, I filed this document electronically with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all parties of record and CM/ECF participants in this case.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 5th day of June 2019.

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